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Attorney for Defendant  
*Costco Wholesale Corporation, a  
foreign entity*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

LATRICE MUNERLYN,

Plaintiff,

v.

COSTCO WHOLESALE CORPORATION, a  
Domestic Corporation; ROE CORPORATIONS  
I through X, inclusive; and DOES I through X,  
inclusive,

Defendants.

CASE NO.: 2:22-cv-961

**PETITION FOR REMOVAL OF CIVIL  
ACTION**

TO: THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEVADA:

Petitioner COSTCO WHOLESALE CORPORATION (hereinafter "Petitioner"), a  
Washington Corporation respectfully shows:

1. Petitioner is the Defendant in the above-entitled action;
2. On May 31, 2022, an action was commenced against Defendant/Petitioner COSTCO  
WHOLESALE CORPORATION and is now pending in the District Court, Clark County,  
Nevada as Case No. A-22-853350-C. Process of Service was served upon Defendant/Petitioner  
on June 3, 2022. Copies of the Complaint and Summons are attached hereto as Exhibits "A"  
and "B" respectively;

1           3.       This Notice is timely filed pursuant to 28 U.S.C. §1446(a) and (b);

2           4.       Defendant/Petitioner is informed and believes and thereon alleges that there has  
3 been no further proceedings or papers filed in said action;

4           5.       This action is a civil action of which this Court has original jurisdiction under the  
5 provisions of 28 U.S.C.A. §1332 and is one which may be removed to this Court by  
6 Defendant/Petitioner pursuant to the provisions of 28 U.S.C.A. §1441(a)(b) in that it is a civil  
7 action which allegedly arises out of a dispute involving diverse parties where the amount in  
8 controversy exceeds the sum or value of \$75,000.00 due to the Plaintiff undergoing ongoing  
9 medical care from a June 7, 2020 slipping incident, resulting in injuries. The injuries alleged  
10 by Plaintiff include injuries to her right knee, right foot, right hip and right shoulder. She has  
11 thus far incurred material past medical bills, past pain and suffering and has made further  
12 allegations of damages. Plaintiff's Counsel has advised that Plaintiff's past medical bills thus  
13 far exceed \$24,000.00, and Plaintiff will be undergoing a total knee replacement surgery in the  
14 near future. In addition, Plaintiff has a claim of past and future pain and suffering, medical care  
15 and a possible wage loss. All of this resulted after the subject accident and this Court has original  
16 jurisdiction over the claims set forth in Plaintiff's Complaint.  
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18           6.       A copy of Defendant/Petitioner's Notice of Removal of the above-entitled action  
19 to the United States District Court for the District of Nevada, together with copies of the  
20 Summons and Complaint have been deposited with the Deputy Clerk in the Clerk's office for  
21 the Eighth Judicial District Court of the State of Nevada on June 17, 2022 (*See*, copy of Notice  
22 of Filing Notice of Removal attached hereto as Exhibit "C");  
23

24           7.       Copies of all pleadings and papers served upon Defendant in the above-entitled  
25 action are filed herewith; and  
26  
27  
28

WHEREFORE, Defendant/Petitioner prays that the above-entitled action be removed from the Eighth Judicial District Court of the State of Nevada in and for the County of Clark to this Court.

OLSON CANNON GORMLEY &amp; STOBERSKI

MICHAEL A. FEDERICO, ESQ.

9950 West Cheyenne Avenue

Las Vegas, Nevada 89129

Attorneys for Defendant

*Costco Wholesale Corporation*

**AFFIDAVIT OF MICHAEL A. FEDERICO, ESQ.**

STATE OF NEVADA            )  
  ) ss:  
COUNTY OF CLARK         )

MICHAEL A. FEDERICO, ESQ., being first duly sworn deposes and says:

1.       That your affiant is an attorney duly licensed to practice law in the State of Nevada and in the United States District Court, District of Nevada, and that he is a member of the law firm of OLSON CANNON GORMLEY & STOBERSKI, maintaining offices at 9950 West Cheyenne Avenue, Las Vegas, Nevada 89129;

2.       That your affiant is the attorney for Defendant COSTCO WHOLESALE CORPORATION and makes this affidavit on behalf of the Defendant herein and that affiant has prepared and read the foregoing notice and knows the matters set forth and contained therein to be true and correct to the best of affiant's knowledge and belief;

3.       Your affiant further states that on June 17, 2022, through staff he caused to be filed with the Clerk of the Eighth Judicial District Court, a copy of Defendant's Petition for Removal of Civil Action of the above-entitled action to the United States District Court for the District of Nevada at Las Vegas, together with all exhibits, by depositing such copies with the Deputy Clerk in the Clerk's office for the Eighth Judicial District Court of the State of Nevada at the office of the County Clerk, Clark County Courthouse, Las Vegas, Nevada 89101; and

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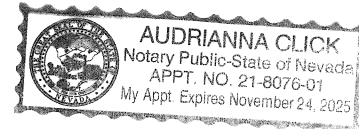
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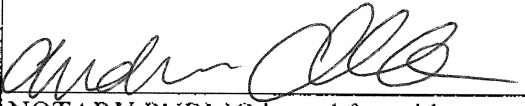
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1           4.       That your affiant caused to be served a Notice of Removal on Roger M. Cram,  
2 Esq. and Brent D. Valdez, Esq. of the law firm of CVBN Law, 9580 W. Sahara Ave., Ste. 180,  
3 Las Vegas, Nevada 89117, attorneys of record for the Plaintiff in the above-entitled action by  
4 depositing the same in the United States mail on June 17, 2022.  
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MICHAEL A. FEDERICO, ESQ.

Subscribed and sworn before me  
this 17<sup>th</sup> day of June, 2022.




  
NOTARY PUBLIC in and for said  
County and State

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 17<sup>th</sup> day of June, 2022, I sent a true and correct copy of the above and foregoing **PETITION FOR REMOVAL OF CIVIL ACTION** to the parties listed below through the CM/ECF system of the United States District Court for the District of Nevada (or, if necessary, by U.S. Mail, first class, postage pre-paid), upon the following:

Roger M. Cram, Esq.  
Brent D. Valdez, Esq.  
CVBN Law  
9580 W. Sahara Ave., Ste. 180  
Las Vegas, NV 89117  
(702) 255-0700  
[rcram@cvbnlaw.com](mailto:rcram@cvbnlaw.com)  
[bvaldez@cvbnlaw.com](mailto:bvaldez@cvbnlaw.com)  
Attorneys for Plaintiff

  
An Employee of Olson Cannon Gormley & Stoberski